

United Technologies Corporation  
United Technologies Building  
Hartford, CT 06101  
(860) 728-7000



May 1, 2012

US EPA RECORDS CENTER REGION 5



436633

***Via Overnight Delivery***

Ms. Michelle Kerr  
Remedial Project Manager  
U.S. Environmental Protection Agency – Region 5  
Superfund Division (SR-6J)  
77 West Jackson Blvd.  
Chicago, IL 60604-3590  
Tel: (312) 886-8961

**Re: Chemetco Superfund Site  
Response to CERCLA § 104(e) Information Request**

Dear Ms. Kerr:

I am writing to respond to the General Notice and Information Request for the Chemetco Superfund Site in Hartford, IL (the Site), dated November 30, 2011 and directed to John F. Hannon, AFAC c/o National Foam, Inc. We understand that the date for responding to this request was extended to May 4, 2012, and this response is being provided within that timeframe.

1. Provide the following information about your company ("Respondent")
  - a. The complete and correct legal name of your company.
  - b. The name(s) and address(es) of the President and the Chairman of the Board, or other presiding officer of the company.
  - c. The state of incorporation of the company and the company's agents for service.
  - d. The name(s) of all subsidiaries, affiliates, or parent companies to your company.
  - e. The state of incorporation and agents for service of process in the state of incorporation.
  - f. The status of all subsidiaries, affiliates, or parent companies to your company.

**RESPONSE:**

- a. Kidde-Fenwal, Inc. (United Technologies Corporation (UTC) on behalf of its wholly owned subsidiary, Kidde-Fenwal, Inc., as the apparent successor to AFAC c/o National Foam, Inc.).
- b. The President of Kidde-Fenwal, Inc. is John C. Vernon. Address: 400 Main Street, Ashland, MA. 01721
- c. State: Delaware. Agent: CT Corporation

- d. The ultimate parent company of Kidde-Fenwal, Inc. is United Technologies Corporation (UTC). UTC acquired Kidde plc., the former ultimate parent company of Kidde-Fenwal, Inc., in 2005.
- e. See response to c.
- f. See above.

2. Describe and provide any documents related to your company's business activities which resulted in sending material to Chemetco.

**RESPONSE:** Although reasonably diligent searches were performed, the only documents identified regarding activities which may have resulted in sending materials to Chemetco are the following:

- 1. Letter dated October 9, 2001 from USEPA to West Virginia Department of Environmental Protection. RCRA Compliance Evaluation Inspection dated April 25, 2001. Copy set forth in Attachment A.
- 2. Internal Kidde Fenwal memorandum dated August 10, 2009. Copy set forth in Attachment B.
- 3. Letter and internal memo dated March 28, 1996. Letter is from Industrial Recycling Services, Inc. to Badger Fire Protection, Inc. (an apparent predecessor to Kidde-Fenwal, Inc.). Copy set forth in Attachment C.

As far as we know based on presently available information, the only materials sent by Respondent to Chemetco were recyclable bits and pieces of scrap metals sold and shipped to the Chemetco warehouses in Cleveland, OH, Pittsburgh, PA or McKees Rocks, PA, by a former facility in Ranson, WV. This facility ceased operations in 2006, shortly after UTC's acquisition of Kidde plc.

We understand that all such materials were recycled and are exempt under CERCLA, and no wastes or disposal were involved. We are not aware of any non-compliance on our part with respect to the recycling of these materials, nor were we aware of any non-compliance on the part of the Site during the time our materials were arranged for recycling. To the extent other materials were present in the scrap metal arranged for recycling, they are believed to have been minor amounts incident to or adhering to the recyclable scrap metal as a result of its normal and customary use prior to becoming scrap.

3. Describe and provide any documents related to your company's role at the Site, including what duties/involvement your company had at the Site.

**RESPONSE:** None. Respondent had no role at the Site.

4. If the nature or size of Respondent's activities in relation to Chemetco changed over time, describe those changes and the dates they occurred.

**RESPONSE:** See Responses to questions 2 and 3 above.

5. For each type of waste or material used in Respondent's operations, describe and provide documents relating to Respondent's contracts, agreements, or other arrangements for its disposal, treatment, trading, or recycling with Chemetco, including but not limited to whether Respondent controlled where waste sent to Chemetco warehouses was ultimately processed/recycled.

**RESPONSE:** See Response to question 2 above.

6. If not already provided, specify the dates and circumstances when Respondent's waste or material was taken to the Site, and identify the companies or individuals who brought Respondent's waste/material to the Site. Provide any documents which support or memorialize your response.

**RESPONSE:** See Response to question 2 above.

7. Were transactions between your company and Chemetco and specifically the Site: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date?

**RESPONSE:** See Response to question 2 above.

8. Did your company have any influence over waste disposal or recycling activities at the Site? If so, how?

**RESPONSE:** No, see Response to question 2 above.

9. Was any shipment of material sent to the Site by Respondent ever refused and/or returned? If so, describe this event in detail, including its cause and outcome.

**RESPONSE:** No, see Response to Question 2 above.

10. Describe in detail the types of material that you sent for recycling, processing, or disposal at the Site. In your response, please also give the generic names of each type of materials shipped to the Site [e.g. scrap metal (including scrap automobiles), batteries, electronics, scrap paper, scrap paper, scrap plastic or scrap textile, etc.].

- a. Identify whether the materials were delivered directly to the Site or were trans-shipped there from another intermediate delivery point. If applicable, describe each delivery point.
- b. State whether any of the material was ever tested by your company and if so, whether the substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. § 261, Subpart C.
- c. Describe what was done to materials once they were brought to the Site, including any further processing of the materials.

- d. Provide any additional information and all documents that you believe are related to the type, nature and characteristics of the material you sent to the Site.
- e. List the years in which your company sent materials to Chemetco and/or its broker(s) for recycling, processing, or disposal.

**RESPONSE:** See Response to question 2 above.

Questions and Requests for Documents Related to Scrap Metal

11. For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
- a. Did a market exist for the scrap metal listed in your response to No. 10 above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of the commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
  - b. What commercial specification grade did the scrap metal listed in your response to question No. 10 meet? Identify/list the commercial specification grades that each scrap metal identified in No. 9 met.
  - c. At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question No. 10? Did this include burning as fuel, or for energy recovery, or incineration?
  - d. After sale, transfer, delivery, recycling, or disposal, what portion of the scrap metal listed in your response to question No. 10 was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.
  - e. Could the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a virgin raw material? If so, provide details.
  - f. Could any products made from the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
  - g. Did your company melt the scrap metal listed in your response to question No. 10 before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal.
  - h. Describe the source of or the process that produced the materials sent to the Site.

**RESPONSE:** See Response to question 2 above. The scrap metal was not melted prior to being arranged for recycling.

12. Did any of the scrap material sent to the Site contain other material(s) incident to or adhering to the scrap? If so, describe in detail.

**RESPONSE:** See Response to question 2 above.

13. Did any of the material sent to the Site contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at the Site, after being received at the Site, or was the wire not stripped?

**RESPONSE:** See Response to question 2 above.

14. Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.

**RESPONSE:** See Response to question 2 above.

15. Describe all efforts (i.e., Site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question No. 10.

**RESPONSE:** See Response to question 2 above.

Questions and Request for Documents Related to Electrical and Electronic Equipment

16. For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers, monitors, cables, circuit boards, or other electrical equipment). Provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
- List an estimated number of shipments of electrical and electronic equipment your company sent to the Site on an annual basis and list the years. In this list, include the type and quantity, volume and weight of electrical and electronic equipment sent;
  - At the time of the transaction(s), what was the intended disposition of the electrical and electronic equipment listed in your response to question 15(a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?

**RESPONSE:** None.

17. With respect to waste or materials sent to the Site, at the time of the transactions, specify the measures you took to determine the actual means of treatment, disposal, recycling, or other uses of the material. Provide information you had and any documents relating to the treatment, recycling and disposal practices of Chemetco at the Site. What assurances, if any, were given by the owner/operator of the Site regarding the proper handling and ultimate disposition of the materials you sent there, as well as its compliance with applicable environmental laws? Include in your response any correspondence to and from Chemetco relating to this topic and dates the measures were taken or assurances were given.

**RESPONSE:** See Response to question 2 above.

18. What efforts and when, if any, did you take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling,

transferring, delivering disposing of, trading, or arranging for the treatment, recycling, or disposal of any materials?

**RESPONSE:** See Response to question 2 above.

19. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials, particularly Section 127 of CERCLA, 42 U.S.C. § 9627, sent to the Chemetco Site.

**RESPONSE:** See Response to question 2 above.

20. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding scrap metal promulgated under Resource Conservation and Recovery Act (RCRA).

**RESPONSE:** See Response to question 2 above.

21. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

**RESPONSE:** EPA Id: WV0000026153 (West Second Street, Ranson Facility)

EPA Id: WVD003062643 (North Mildred Street, Ranson Foundry)

22. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 *et seq.*, (TSCA) Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 *et seq.*, (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 *et seq.*

**RESPONSE:** With respect to the Site, see Response to question 2 above.

23. Identify the federal and state offices to which such information was sent. State the years during which such information was sent/filled.

**RESPONSE:** With respect to the Site, see Response to question 2 above.

24. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

**RESPONSE:** We believe the United States Environmental Protection Agency has additional information that may be relevant to this matter. Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, this is a formal request to be provided with reasonable access to any and all information related to the Site in the possession or control of the United States Environmental Protection Agency and regardless of format or manner of

documentation. We are prepared to revise our responses as appropriate based on additional information that may be provided.

25. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained. If the records were destroyed, provide us with the following:
- a. the document retention policy between 1970 and 2001;
  - b. a description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction
  - c. a description of the type of information that would have been contained in the documents;
  - d. the name, job title and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for the destruction of these documents; and the person(s) who had and/or still may have the originals or copies of these documents; and
  - e. the names and most current address of any person(s) who may possess documents relevant to this inquiry.

**RESPONSE:** Very limited documentation is presently available. The Respondent's former facility in Ranson, WV, ceased operations in 2006. Shipments/transactions involving scrap materials would have been shown on invoices but such invoices were not retained beyond the time of the facility closure.

26. Please state the name, title and address of each individual who assisted or was consulted in the preparation of the response to this information request.

**RESPONSE:**

William Leikin: Assistant General Counsel, UTC  
Elizabeth Lang: Site Remediation Manager, UTC  
Diane Andrews: In-house Counsel for UTC's Climate, Controls and Systems Business  
Rachel Weiskind: EH&S Manager for UTC's Climate Controls and Systems Business  
Jamie Davis: EH&S Manager for UTC's Climate, Controls and Systems Business  
Craig French (former Kidde-Fenwal employee at Former Ranson, WV facility)  
David Cheshire (former Kidde-Fenwal employee at former Ranson, WV facility)

Please feel free to contact me at (860)728-6430 or [william.leikin@utc.com](mailto:william.leikin@utc.com) if you have any questions related to this matter.

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the

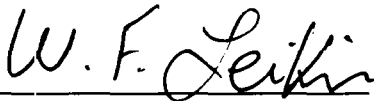
Ms. Michelle Kerr

May 1, 2012

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information submitted is to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in black ink, reading "W. F. Leikin". The signature is written in a cursive style with a horizontal line underneath the name.

William F. Leikin

Assistant General Counsel

United Technologies Corporation

(on behalf of its wholly owned subsidiary, Kidde-Fenwal, Inc., as the apparent successor to AFAC c/o National Foam, Inc.).

Attachments



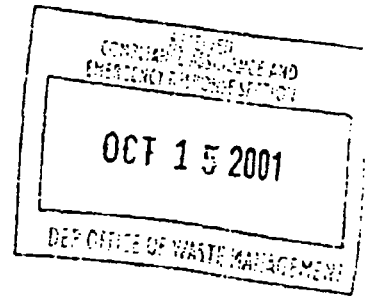
# **ATTACHMENT A**

UTX00040653 UTCFS001 Box 1 0000890

cc: Fairmont PWM  
RT: T. Fisher → file 11-22-01



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029



Mike Dorsey  
West Virginia Division of Environmental Protection  
Office of Waste Management  
Compliance Assurance/Emergency Response  
1356 Hansford Street  
Charleston, WV 25301

OCT 9 2001

Re: Figgie Fire Protection System and  
Badger Fire Protection System

Dear Mr. Dorsey:

Enclosed are copies of the final reports for the EPA led inspections at the above captioned facilities. EPA's initial screening process has been completed and the agency is evaluating the appropriate enforcement action for reports with violations.

If you have any questions or would like to discuss these cases further, feel free to call me at 215-814-2041.

Sincerely,

A handwritten signature in black ink, appearing to be "Donald J. Lott".

Donald J. Lott, Chief  
RCRA Compliance and Enforcement Branch

Enclosure

cc: Naomi Henry (3WC31)  
Tapan Basu (3WC31)



**RCRA Compliance Evaluation Inspection**

**Badger Fire Protection System  
(aka Kidde Firefighting Co.)  
West Second Avenue  
Ranson, WV 25438**

**Telephone Number: (304) 725-9721**

**Date of Inspection:  
April 25, 2001**

**RCRA Identification Number: WV0000026153**

**EPA Representatives:**

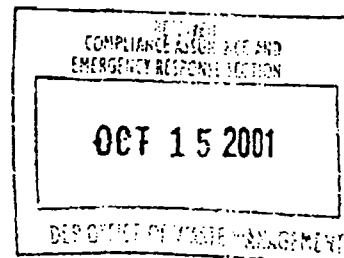
**Jeffrey A. Dodd, Environmental Scientist  
Office of Enforcement, Compliance and  
Environmental Justice  
(304) 234-0254**

**State Representatives:**

**Stan Moskal, Inspector  
John Hando Inspector  
Henry Haas, Inspector  
WV Dept. of Env. Protection  
(304) 368-3950**

**Facility Representative:**

**Robert Gourlay, Jr., Director of Operations  
(304) 725-9721**



### Inspection Observations

According to Mr. Gourlay raw materials used by Kidde at the parts machining facility location include pre-cast aluminum, brass and steel parts which are finished using various processes at the West Second Avenue portion of the facility. The general production process consists of various degreasing and parts machining lines where pre-cast steel, brass and aluminum parts are purchased from outside vendors, as well as aluminum and brass parts which are cast at Kidde's foundry located on N. Mildred St. in Ranson, WV which are prepared and machined to final specifications. Two (2) large parts cleaners (see photos 4, 6, and 7) and two smaller parts cleaner (see photos 14 and 20) are present at the W. Second Avenue location and are used to degrease various cast parts prior to machining and to clean equipment, respectively. Several automated machine lines where parts are deburred, turned, drilled and polished are located throughout the production floor. Figure 1 is a floor diagram of the W. Second Avenue facility showing the layout of the major process lines at the facility. Water and petroleum based coolants are used in most of the automated machining processes. The machining processes generate scrap brass, steel, and aluminum in the form of grindings, turnings and chips, most of which are also mixed with coolants. See photos 1, 3 and 8. The scrap metal/coolant mixtures are collected in hopper carts which are then transferred to the N. Mildred St. facility, where the scrap metal/coolant mixtures are centrifuged to remove the coolant from the metal scrap. The scrap metals are then drummed and stored at the N. Mildred St. facility prior to shipment off-site for recycling. The coolant is transferred to an aboveground storage tank located at the N. Mildred Street location for subsequent disposal as used oil. Table 1 summarizes the scrap metal waste streams sent off-site for recycling by Kidde. Attachment 4 contains the receipts for calendar year 2000 of scrap metals sent off-site by Kidde for recycling.

**Table 1: Scrap Metal Waste Streams Sent Off-site for Recycling<sup>1</sup>**

Calendar Year: 2000

| WASTE STREAM            | FACILITY                                 |
|-------------------------|--|
| Yellow brass turnings   | Chase Brass & Copper Co., Montpelier, OH |
| Yellow brass rod ends   | Chase Brass & Copper Co., Montpelier, OH |
| Red Brass Solids        | Chemetco, Cleveland, OH                  |
| Mixed turnings          | Chemetco, Cleveland, OH                  |
| Aluminum solids         | Chemetco, Cleveland, OH                  |
| Oily red brass turnings | Chemetco, Cleveland, OH                  |
| Aluminum grinding dust  | Chemetco, Cleveland, OH                  |
| Zinc oxide              | Chemetco, Cleveland, OH                  |
| Floor skimmings         | Chemetco, Cleveland, OH                  |

**Table 2: Chromium (D007) Containing Paint Waste Stream Disposal Summary**

Calendar Year: 2000

| Date     | Waste Stream | Manifest No. | Quantity  | Facility   | LDR Form |
|----------|--------------|--------------|-----------|------------|----------|
| 12/14/00 | D007         | SK9566235    | 200 lbs   | Denton, TX | ✓        |
| 9/26/00  | D007         | SK956213     | 200 lbs   | Denton, TX | ✓        |
| 7/12/00  | D007         | SK956211     | 200 lbs   | Denton, TX | ✓        |
| 4/25/00  | D007         | SK160038     | 200 lbs   | Denton, TX | ✓        |
| 3/9/00   | D007         | 8364712      | 250 lbs   | Dolton, IL | ✓        |
| Total    |              |              | 1050 lbs. |            |          |

1050 lbs. / 12 months = 87.5 lbs./month = 39.8 kg/month

Disposal Facility #1: Safety-Kleen Systems, Inc. (Denton, TX)

RCRA ID No.: TXD077603371

Disposal Facility #2: Safety-Kleen Systems, Inc. (Dolton, IL)

RCRA ID No.: ILD980613913

**Table 4: Petroleum Naptha (D039) Waste Stream Disposal Summary**

Calendar Year: 2000

| Date     | Waste Stream       | Manifest No. | Quantity | Facility      | LDR Form |
|----------|--------------------|--------------|----------|---------------|----------|
| 12/12/00 | D039 (Pet. Naptha) | 0920513      | 114 gal  | Baltimore, MD | ✓        |
| 12/01/00 | D039 (Pet. Naptha) | 0914885      | 16 gal   | Baltimore, MD | ✓        |
| 11/29/00 | D039 (Pet. Naptha) | 0914678      | 16 gal   | Baltimore, MD | ✓        |
| 11/08/00 | D039 (Pet. Naptha) | 0913231      | 114 gal  | Baltimore, MD | ✓        |
| 10/24/00 | D039 (Pet. Naptha) | 0917682      | 344 gal  | Baltimore, MD | ✓        |
| 10/02/00 | D039 (Pet. Naptha) | 0914293      | 60 gal   | Baltimore, MD | ✓        |
| 9/21/00  | D039 (Pet. Naptha) | 0919266      | 42 gal.  | Baltimore, MD | ✓        |
| 9/13/00  | D039 (Pet. Naptha) | 0883242      | 16 gal.  | Baltimore, MD | ✓        |
| 9/5/00   | D039 (Pet. Naptha) | 0913641      | 16 gal.  | Baltimore, MD | ✓        |
| 8/22/00  | D039 (Pet. Naptha) | 0920865      | 66 gal.  | Baltimore, MD | ✓        |
| 8/3/00   | D039 (Pet. Naptha) | 0915375      | 102 gal. | Baltimore, MD | ✓        |
| 7/13/00  | D039 (Pet. Naptha) | 0918007      | 66 gal.  | Baltimore, MD | ✓        |
| 6/23/00  | D039 (Pet. Naptha) | 0915047      | 66 gal.  | Baltimore, MD | ✓        |
| 6/15/00  | D039 (Pet. Naptha) | 0912236      | 14 gal.  | Baltimore, MD | ✓        |
| 6/05/00  | D039 (Pet. Naptha) | 0878750      | 98 gal.  | Baltimore, MD | ✓        |
| 5/16/00  | D039 (Pet. Naptha) | 0879272      | 8 gal.   | Baltimore, MD | ✓        |
| 4/27/00  | D039 (Pet. Naptha) | 0876886      | 66 gal.  | Baltimore, MD | ✓        |
| 4/3/00   | D039 (Pet. Naptha) | 0880465      | 122 gal. | Baltimore, MD | ✓        |
| 3/20/00  | D039 (Pet. Naptha) | 0880191      | 87 gal.  | Baltimore, MD | ✓        |
| 2/8/00   | D039 (Pet. Naptha) | 0880837      | 87 gal.  | Baltimore, MD | ✓        |
| 2/3/00   | D039 (Pet. Naptha) | 0872164      | 16 gal.  | Baltimore, MD | ✓        |
| 2/8/00   | D039 (Pet. Naptha) | 0840699      | 90 gal.  | Baltimore, MD | ✓        |
| Total    |                    |              | 1626 gal |               |          |

1626 gal. x 6.7 lbs./gal = 10894.2 lbs / 12 months = 907.9 lbs./month = 412.7 kg/month

Disposal Facility #1: Safety-Kleen Systems, Inc. (Baltimore, MD)

RCRA ID No.: MDD981034291

### Permit Status

The parts machining facility (WV0000026153) of Kidde Firefighting Co. located on W. Second Avenue is currently listed as a small quantity generator in the RCRA Information System (RCRIS) database (see Attachment 1). Based upon hazardous waste generation in calendar 2000 as reported on hazardous waste manifests for RCRA ID. No. WV0000026153, the facility generated approximately 1,278.5 kg/month of hazardous waste on the average (see Attachment 2). Generation of greater than 1,000 kg/month of hazardous waste classifies a facility as a large quantity generator.

### Inspection Observations

During the inspection, WVDEP Inspector Henry Haas asked Mr. Gourlay how spent light bulbs were managed at the facility. The facility representative indicated that he would have to check on how the spent bulbs were handled, but thought that they were disposed of as trash. In response to EPA's request for additional documentation and information concerning hazardous waste management at the facility, the facility indicated that according to their hazardous waste disposal contractor, if less than 5 light bulbs are placed into the trash container, it was considered incidental and no documentation or notification was required. The facility representative further indicated that the facility would be talking to their hazardous waste disposal contractor concerning disposal of spent bulbs. See Attachment 3.

### Attachments

1. Compliance Monitoring and Enforcement Violation Report
2. Hazardous Waste Stream Generation Summaries for Calendar Year 2000
3. Facility Documentation

# **ATTACHMENT B**





# MEMORANDUM

Date: August 10, 2009

To: Rachael Weiskind, GFP EH&S Manager

From: Vera M. Jones, Kidde-Fenwal, Inc. EH&S Coordinator

Re: Ranson Facility's Scrap Metal Sales

The EH&S files from the Ranson, West Virginia facility were reviewed to gather the following details concerning the facility's scrap metal sales:

| Company Scrap Shipped To         | Date/Date Range        | Material Type  | Ship To Address                                      | Mailing Address  |
|----------------------------------|------------------------|--|--|--|
| Cerro Metal Products             | 10/18/94               | Brass  | Logans Run<br>Bellefonte, PA 16823                   | P.O. Box 388<br>Bellefonte, PA 16823                                       |
| H. Kramer Co.                    | 06/19/95               | Brass, aluminum, mixed metals  | 1315 W. 21 <sup>st</sup> Street<br>Chicago, IL 60608 | Same   |
| Chemtco, Inc.                    | 10/07/93 –<br>02/18/94 | Brass, aluminum, zinc oxide, mixed metals  | 28 McCandless Avenue<br>Pittsburgh, PA 15201         | Chemtco Inc.<br>P.O. Box 8<br>Hartford, IL 62048                           |
| Industrial Recycling Services    | 03/14/94 –<br>05/06/94 | Brass, zinc oxide, aluminum, mixed metals  | 1300 Island Avenue<br>McKeesrock, PA 15136           | Chemtco Inc.<br>P.O. Box 8<br>Hartford, IL 62048                           |
| Industrial Recycling Services    | 06/02/94 -<br>03/10/98 | Brass, aluminum, steel, zinc oxide, bronze, mixed metals   | 1300 Island Avenue<br>McKeesrock, PA 15136           | 1300 Island Avenue<br>McKeesrock, PA 15136                                 |
| Kearny Smelting & Refining Corp. | 01/27/92 –<br>10/27/99 | Brass, bronze, copper, zinc oxide, sprinkler parts, mixed metals   | 936 Harrison Avenue<br>Kearny, NJ 07029              | 936 Harrison Avenue<br>Kearny, NJ 07029                                    |
| Chase Brass & Copper             | 02/01/93 –<br>10/02/01 | Brass  | State Route 15<br>Montpelier, OH 43543               | Williams County Division<br>P.O. Box 152, Route 15<br>Montpelier, OH 43543 |
| Maryland Metals                  | 01/08/93 –<br>06/13/06 | Aluminum, steel, cast iron, brass, stainless, carbide, electrical wiring, copper, silicone, mixed metals | 304 W. Church Street<br>Hagerstown, MD 21740         | P.O. Box 31<br>Hagerstown, MD 21740  |
| Federal Metal Co.                | 04/04/03               | None listed  | 7250 Division Street<br>Bedford, OH 44146            | 7250 Division Street<br>Bedford, OH 44146                                  |
| Colonial Metals Co.              | 12/05/88               | Brass, mixed metals  | 217 Linden Street<br>Columbia, PA 17512              | P.O. Box 311<br>Columbia, PA 17512   |
| Hedger Metals                    | 12/18/92               | Aluminum, bronze, brass, zinc oxide, mixed metals  | 3661 Wanda Road<br>Edwardsville, IL 62025            | P.O. Box 825<br>Edwardsville, IL 62025                                     |

| Company Scrap Shipped To          | Date/Date Range                             | Material Type                                     | Ship To Address   | Mailing Address  |
|-----------------------------------|---|---|---|--|
| Tri-Pitt Service                  | 02/19/93 – 09/28/93                         | Brass, aluminum, zinc oxide, bronze, mixed metals | 28 McCandless Avenue<br>Pittsburgh, PA 15201                    | Concorde Trading Co.<br>P.O. Box 8<br>Hartford, IL 62048       |
| Industrial Metals Recycling Corp. | 02/25/93 – 08/26/93                         | Brass, aluminum, mixed metals                     | 3810 Rose Street<br>Schiller Park, IL 60176                     | 3810 Rose Street<br>Schiller Park, IL 60176                    |
| Charles Bluestone Co.             | 03/24/98                                    | Brass, aluminum, mixed metals                     | P.O. Box 326<br>Elizabeth, PA 15037                             | P.O. Box 326<br>Elizabeth, PA 15037                            |
| Thalheimer Brothers, Inc.         | 11/15/01 – 12/17/03;<br>01/12/05 – 06/14/06 | Brass, aluminum, zinc oxide, mixed metals         | 5550 Whitaker Avenue<br>Philadelphia, PA 19124                  | 5550 Whitaker Avenue<br>Philadelphia, PA 19124                 |
| Chemetco                          | 03/19/98 – 10/25/01                         | Brass, aluminum, zinc oxide, mixed metals         | 1302 East 40 <sup>th</sup> Street<br>Cleveland, OH 44114        | 1302 East 40 <sup>th</sup> Street<br>Cleveland, OH 44114       |
| Commercial Alloys Corp.           | 04/11/97 – 01/28/98                         | Aluminum  | 160 North Field Road<br>Bedford, OH 44146                       | 160 North Field Road<br>Bedford, OH 44146                      |
| Commercial Alloys Corp.           | 02/10/98 – 12/12/03                         | Aluminum  | 1831 East Highland Road<br>Twinsburg, OH 44087                  | 1831 East Highland Road<br>Twinsburg, OH 44087                 |
| Commercial Alloys Corp.           | 01/12/04 – 06/13/06                         | Aluminum  | Unclear addresses/data on<br>debit memos during this<br>period. | Unclear addresses/data on<br>debit memo during this<br>period. |

A company is listed more than once if either the Ship To Address or Mailing Address changed during the scrap sale period. The files containing the debit memos for scrap sales were consolidated into one box.

# **ATTACHMENT C**

**POWHATAN**

**FAX TRANSMITTAL**

**DATE:** 3/28/96

**FROM:** BOB SMITH

**PHONE:** 304-728-5251

**FAX:** 304-728-8481

**TO:** BOB COLEMAN

**COMPANY:** \_\_\_\_\_

**FAX:** 703-243-1606

**NUMBER OF PAGES (INCLUDING COVER):** 3

ONE OF THE CONCERNS EXPRESSED BY DAMES & MOORE WAS REGARDING  
THE SHIPMENT OF BRASS & SAND AS A SALEABLE ITEM FOR RECLAMATION/  
RECYCLING -

THIS MATERIAL IS SOLD TO I.R.S. AND A LETTER IS ATTACHED  
WHICH DESCRIBES THEIR PROCESS -

DO YOU THINK WE HAVE A POTENTIAL PROBLEM WITH  
HANDLING THIS MATERIAL IN THIS MANNER?



**I**ndustrial  
**R**ecycling  
**S**ervices, Inc.*No longer  
exists  
in area*1300 Island Avenue  
McKees Rocks, PA 15136  
(412) 331-5175  
Fax (412) 331-5487

March 28, 1996

Badger Fire Protection, Inc.  
P.O. Box 400  
Ranson, WV 25438

Attn.: Bob Smith

Dear Mr. Smith:

It is my pleasure to address your concerns on the handling of your scrap materials. Industrial Recycling Services, Inc. is a wholesale scrap metal company headquartered in Canton, OH. The Pittsburgh location, where we handle your account, was a division of Chemetco, Inc. until February 1, 1994. At that time the assets of this facility were purchased by Industrial Recycling and an agreement was made to continue to service suppliers in the fashion they were accustomed to.

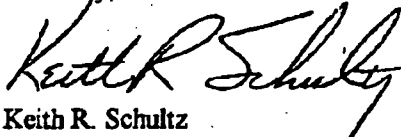
Our relationship with Chemetco allows us to continue to provide you with an audit trail of your material from the time it is loaded at your facility until it has been actually consumed at the refinery. This information is available on an as requested basis.

The foundry sand / brass mixture that we handle from your plant is consumed directly through the furnaces for the recovery of contained copper, lead and tin. The material is not sifted to remove the metallics leaving the sand for disposal in a landfill.

We also have an operation at our facility to drain any residual cutting fluids from your turnings for shipment to a licensed oil recycling facility. None of the products we handle from your company are sent to a landfill with the possible exception of wood, paper, etc.

If I can be of any further assistance feel free to contact me at my office.

Sincerely,

Keith R. Schultz  
Regional ManagerMEMBER  
Institute of Scrap  
Recycling  
Industries, Inc.

**FIRST IN PEOPLE - QUALITY - SERVICE**

Chemetco, Inc. is a secondary copper smelter located in a primarily agricultural residential area slightly south of Hartford, Illinois and north of St. Louis, Missouri. Secondary copper smelters separate and purify the metal values from low-grade copper bearing materials such as copper and copper alloy scrap, slags, skimmings, and other non-ferrous materials. Chemetco produces unalloyed (versus "alloyed", i.e. brass and bronze) anode. Unlike many other copper smelters, Chemetco can use any copper-bearing item to produce pure copper anodes.

Chemetco utilizes four top-blown rotary converters to produce four products from the smelting of copper bearing materials: copper anodes, lead/tin solder, crude zinc oxide and slag aggregates. The process is a series of reductions and oxidations using various flux materials such as sand, iron and lime. These fluxes function in two ways. The first lowers the melting temperature of the metals. The second involves "flux refining". This involves the contact of two immiscible molten phases. In this instance the impure metal and the flux act as an acidic oxide that is both an oxidant and a solvent for the impurities in the metallic phase. During the contact of the two phases, impurities that are oxidized in the metal phase pass into the acidic oxidant phase. This creates what is eventually termed "slag".

Flux materials in the process are used, i.e. limestone is not recycled back into limestone, nor is sand recycled back into sand. They are used for their chemical properties and in the process become a completely different product, slag, that Chemetco processes for use in road construction projects. Minor metal impurities in the sand do not effect the metallurgical process. In fact, sand usage in smelting operations such as Chemetco's is an excellent secondary use of sand fluxes, especially since any metal impurities can be recovered in the metal phases of other Chemetco products.

Chemetco, Inc. does not generate any waste material from the production process. The only wastes generated are solid, non-hazardous wastes, such as cardboard boxes, wood pallets and office wastes. The boxes are sent to a local recycler and the other materials are removed by a local waste disposal company. Other waste materials include cleaning solvents and waste oil from the maintenance of heavy mobile equipment. The solvents are provided and removed by Safety-Kleen Corporation. The waste oil is periodically tested and is not hazardous. It is removed and manifested as non-hazardous special waste and is burned for fuel.

Chemetco is a net consumer of water with no discharge except for stormwater runoff from a small unused area of the 40 acre plant-site. This discharge is NPDES permitted. Water is drawn from two facility wells which are drilled down into the bedrock and are capable of pumping 750 gallons per minute for contact and non-contact cooling. In addition, stormwater is collected from active portions of the property for use in the contact cooling water system. Net water usage is over 1,000,000 gallons per month. Due to the high temperatures associated with copper smelting, the main loss of water is in steam and evaporation. However, a small amount of water leaves the plant as moisture in the wet zinc oxide cake.

Chemetco, Inc. is not a hazardous waste treatment facility. Neither does Chemetco have a Resource Conservation and Recovery Act Part B Permit allowing us to accept material accompanied by a hazardous waste manifest. Chemetco, Inc. expressly reserves the right to refuse shipment of such materials.

1300 ISLAND AVENUE MCKEES ROCKS PA 15136 (800)-932-7797